

Mr. Grant McGuire
RR Donnelley & Sons Company
P. O. Box 837
Warsaw, Indiana 46581-0837

Re: A085-12261-00009
Amendment to PSD/CP085-4396-00009,

Dear Mr. McGuire:

RR Donnelley & Sons Company was issued a permit on November 27, 1995 for the construction of two (2) publication rotogravure printing presses WR0493 and WR0494 to be located at Old Route 30 West, Warsaw, Indiana. A letter requesting an extension of the 18-month commencement of construction deadline was received on May 15, 2000. The construction deadline found in 40 CFR 52.21(r)(2) will be extended based on the following findings:

- (a) There are no Prevention of Significant Deterioration (PSD) increment consumption and no interim source growth in the area that may have occurred and would cause significant degradation of air quality;
- (b) New federal and state regulations applicable to the two (2) publication rotogravure printing presses WR0493 and WR0494, were determined; and
- (c) The RACT/BACT/LAER Clearinghouse was reviewed, the finding is that the technology (carbon adsorption solvent recovery system) to be utilized by RR Donnelley is still considered BACT in the recent determination.

The following conditions shall be applicable in addition to the operation conditions in the issued PSD/CP085-4396-00009:

- (10) General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]
The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to presses WR0493 and WR0494 except when otherwise specified in 40 CFR 63, Subpart KK.
- (11) Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR 63, Subpart KK]
This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1.
 - (a) The facility, including the two (2) publication rotogravure printing presses WR0493 and WR0494, shall limit emissions of organic HAP to no more than eight percent (8%) of the total volatile matter used each month.
 - (b) The Permittee shall comply with all applicable provisions of this rule upon start-up or May 30, 1999, whichever is later.

- (12) Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR 63, Subpart KK]
- (a) Pursuant to Part 63.824(b), of this NESHAP, the source shall operate the carbon adsorber solvent recovery system to achieve an overall monthly effective organic HAP control efficiency of 92%. The overall VOC 365-day rolling control efficiency of 98% for the carbon adsorber solvent recovery system that will control presses WR0493 and WR0494, in addition to the controlled HAP emissions from the other operations at the facility, will satisfy the monthly overall efficiency of 92%, required under this NESHAP.
- (b) The Permittee shall demonstrate compliance with the 8% organic HAP emissions limit in condition no. 12 of this amendment by using the following procedures in paragraph (b)(1) using a solvent recovery device as control:
- (1) Each owner or operator using solvent recovery device to control emissions shall demonstrate compliance by showing that the HAP emission limitation is achieved by either of the following:
- (i) Perform a liquid-liquid material balance for each month as follows:
- (A) Measure the mass of each ink, coating, varnish adhesive, primer, solvent and other material used by the affected source during the month.
- (B) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent and other material used by the affected source during the month using the following procedure in § 63.827 (b)(1):
- (1) The owner or operator of the publication rotogravure facility shall determine the organic HAP weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, and other material used in a publication rotogravure affected source by following one of the procedures in paragraphs (b)(1)(i) through (b)(1)(iii) of this section:
- (i) The owner or operator may test the material in accordance with Method 311 of appendix A of this part 63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values cannot be determined using Method 311, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator. The recovery efficiency of the technique must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.
- (ii) The owner or operator may determine the

volatile matter content of the material in accordance with Sec. 63.827(c)(1) and use this value for the organic HAP content for all compliance purposes.

- (iii) The owner or operator may, except as noted in paragraph (b)(1)(iv) of this section, rely on formulation data provided by the manufacturer of the material on a CPDS if
 - (A) The manufacturer has included in the organic HAP content determination all HAP present at a level greater than 0.1 percent in any raw material used, weighted by the mass fraction of each raw material used in the material, and
 - (B) The manufacturer has determined the HAP content of each raw material present in the formulation by Method 311 of appendix A of this part 63, or by an alternate method approved by the Administrator, or by reliance on a CPDS from a raw material supplier prepared in accordance with Sec. 63.827(b)(1)(iii)(A).
 - (iv) In the event of any inconsistency between the Method 311 of Appendix A of Part 63 test data and formulation data, that is, if the Method 311 test value is higher, the Method 311 test data shall govern, unless after consultation, an owner or operator demonstrates to the satisfaction of the enforcement authority that the formulation data are correct.
- (C) Determine the volatile matter content, including water, of each ink, coating, varnish, adhesive, primer, solvent, and other material used by the affected source during the month following the procedure in Sec. 63.827(c)(1).
- (1) Each owner or operator of a publication rotogravure facility shall determine the volatile matter weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material used using Method 24A of 40 CFR part 60, appendix A. The Method 24A determination may be performed by the manufacturer of the material and the results

provided to the owner or operator. If these values cannot be determined using Method 24A, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator. The owner or operator may rely on formulation data, subject to the provisions of paragraph (c)(3) of this section.

- (2) Owners or operators may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Appendix A, the applicable test method shall govern, unless after consultation, the owner or operator can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (D) Install, calibrate, maintain and operate, according to the manufacturer's specifications, a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device shall be initially certified by the manufacturer to be accurate to within <plus-minus>2.0 percent.
- (E) Measure the amount of volatile matter recovered for the month.
- (F) Calculate the overall effective organic HAP control efficiency (R_e) for the month using the following equation:

$$R_e = (100) \frac{M_{vu} - M_{hu} + [(M_{vr})(M_{hu})/M_{vu}]}{M_{vu}}$$

Where:

M_{hu} = the mass of organic HAP used in a month, kg.

M_{vu} = the mass of volatile matter, including water, used in a month, kg.

R_e = the overall effective organic HAP control efficiency for publication rotogravure, percent.

For the purposes of this calculation, the mass fraction of organic HAP present in the recovered volatile matter is assumed to be equal to the mass fraction of organic HAP present in the volatile matter used.

- (G) The affected source is in compliance for the month, if R_e is at least 92% of each month.
- (ii) Use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site specific operating parameter to assure capture efficiency as specified in paragraphs (b)(1)(ii)(A) through (b)(1)(ii)(E) of this section:
- (A) Install continuous emission monitors to determine the total organic volatile matter mass flow rate (e.g., by determining the concentration of the vent gas in grams per cubic meter, and the volumetric flow rate in cubic meters per second, such that the total organic volatile matter mass flow rate in grams per second can be calculated and summed) at both the inlet to and the outlet from the control device, such that the percent control efficiency (E) of the control device can be calculated for each month.
- (B) Determine the percent capture efficiency (F) of the capture system according to Sec. 63.827(e).
- (C) Calculate the overall effective organic HAP control efficiency (R_e)

$$R_e = (100) \frac{M_{vu} - M_{hu} + [(E/100)(F/100) M_{hu}]}{M_{vu}}$$

Where:

- E = the organic volatile matter control efficiency of the control device, percent
- F = the organic volatile matter capture efficiency of the capture system percent
- M_{hu} = the mass of organic HAP used in a month, kg.
- M_{vu} = the mass of volatile matter, including water, used in a month, kg.
- R_e = the overall effective organic HAP control efficiency for publication rotogravure, percent.
- (D) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameter established in accordance with Sec. 63.828(a)(5) whenever a publication rotogravure printing press is operated.
- (E) The affected source is in compliance with the requirement for the month if R_e is at least 92 percent, and the capture device is operated at an average value greater than, or

less than (as appropriate) the operating parameter value established in accordance with Sec. 63.828(a)(5) for each three-hour period.

- (iii) An owner or operator using a control device to comply with the requirements of 40 CFR 63.824 is not required to conduct an initial performance test to demonstrate compliance if one or more of the criteria in paragraphs (A) through (C) of this section are met:

- (A) A control device that is in operation prior to May 30, 1996, does not need to be tested if
- (1) it is equipped with continuous emission monitors for determining inlet and outlet total organic volatile matter concentration, and capture efficiency has been determined in accordance with the requirements of this subpart, such that an overall HAP control efficiency can be calculated, and
 - (2) the continuous emission monitors are used to demonstrate continuous compliance in accordance with 40 CFR 63.828, or
- (B) the owner or operator has met the requirements of either 40 CFR 63.7(e)(2)(iv) or 40 CFR 63.7(h), or
- (C) the control device is a solvent recovery system and the owner or operator chooses to comply by means of a monthly liquid-liquid material balance.

(13) Graphic Arts Operations

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee shall operate the carbon adsorption system that reduces the volatile organic emissions from the capture system by at least ninety percent (90%) by weight. The capture system in conjunction with the carbon adsorption solvent recovery system used shall attain an efficiency sufficient to achieve an overall control efficiency of seventy-five (75%). The overall control efficiency of 98% for the carbon adsorber solvent recovery system that will control presses WR0493 and WR0494 satisfies the overall efficiency of 75%, required under this rule.

(14) Record Keeping Requirements

Pursuant to 40 CFR 63.829 (Recordkeeping Requirements), each owner or operator of an affected source subject to this 40 CFR 63 subpart KK shall maintain the records specified in paragraphs (b)(1) through (b)(3) of this section on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1):

- (1) Records specified in 40 CFR 63.10(b)(2), of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support

data that the source is required to report as otherwise excused, shall be considered a violation of the emission standard.

Each owner or operator of an affected source subject to 40 CFR 63 subpart KK shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.824. The records shall be maintained in accordance with the requirements of 40 CFR 63.10(b).

Based on the above findings, Construction Condition No. 4 commencement of construction found in the PSD permit shall be extended to January 27, 2002.

All other conditions of the original permit shall remain unchanged and in effect. Please attach a copy of this amendment with the original permit.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

APD

cc: File - Kosciusko County
Kosciusko County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Jerri Curless
Permit Tracking - Janet Mobley
Air Programs Section - Michelle Boner

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for 2nd Amendment to PSD Permit

Source Background and Description

Source Name:	RR Donnelley & Sons Company	
Source Location:	Old Route 30 West, Warsaw, Indiana 46581	
County:	Kosciusko	
SIC Code:	2754	
2 nd Amendment No.:	085-12261-00009	
PSD/Construction Permit No.:	085-4396-00009	Issuance Date: November 27, 1995
1 st Amendment No.:	085-8369-00009	Issuance Date: April 4, 1997
Permit Reviewer:	Aida De Guzman	

The Office of Air Management (OAM) has reviewed an application from RR Donnelley & Sons Company relating to the request for a 2nd amendment to PSD permit 085-4396, issued on November 27, 1995, to extend the 18-month commencement of construction deadline. The PSD permit was issued for the construction of two (2) publication rotogravure printing presses WR0493 and WR0494.

The first extension for the 18-month commencement of construction deadline was granted in the 1st Amendment 085-8369-00009, issued on April 4, 1997. A second extension for the 18-month commencement of construction deadline was issued December 1, 1998, and should expire May 27, 2000. To date, construction of the presses covered in this PSD has not commenced. RR Donnelley is in discussions with their major customers relating to significant contract expansion. This expansion will result in the installation of the permitted printing presses. The source is anticipating that this contract discussion will be concluded and a final decision will be reached in the next 60 to 90 days, and therefore requesting another extension to the PSD permit.

The following criteria were examined prior to extending the 18-month commencement of construction deadline found in 40 CFR 52.21 (r)(2):

- (a) A re-analysis of the Prevention of Significant Deterioration (PSD) increment consumption and air quality impacts were made. Mark Derf of Modeling Section verified that there is no interim source growth in the area that may have occurred and would cause significant degradation of air quality.
- (b) New federal and state regulations applicable to the two (2) publication rotogravure printing presses WR0493 and WR0494, were determined.
- (c) A re-analysis of the best available control technology (BACT) was made, which include reviewing the latest control technology in the RACT/BACT/LAER Clearinghouse determined for the printing industry. The finding is that the technology (carbon adsorption solvent recovery system) to be utilized by RR Donnelley is still considered BACT in the recent determination.

Public comment procedure, including a 30-day public comment period, will be required for this extension request as for permit modifications. Request for public hearing and petition for permit appeals shall follow the applicable procedures of 40 CFR Part 124.

Recommendation

The staff recommends to the Commissioner that the request for an extension to the 18-month commencement of construction deadline be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 15, 2000, and additional information was received on June 9, 2000 and via e-mail on June 13, 2000.

Federal Rule Applicability

- (1) 40 CFR Part 63.822, Subpart KK - National Emission Standards for the Printing and Publishing Industry - This NESHAP applies to each new and existing facility that is a major source of hazardous air pollutants (HAPs), at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated.

The proposed two (2) printing presses WR0493 and WR0494 will be part of an existing facility subject to this NESHAP.

- (a) The Permittee shall comply with these requirements upon start-up of the affected source or May 30, 1999, whichever is later.
- (b) Each publication rotogravure affected source shall limit emissions of organic HAP to no more than eight percent of the total volatile matter used each month.

The emission limitation may be achieved by overall control of at least 92 percent of organic HAP used; by substitution of non-HAP materials for organic HAP; or by a combination of capture and control technologies and substitution of materials.

The Permittee shall demonstrate compliance with this standard by using the following procedures in paragraph (b)(1) using a solvent recovery device as control:

- (1) Each owner or operator using a solvent recovery device to control emissions shall demonstrate compliance by showing that the HAP emission limitation is achieved by either of paragraph (b)(1)(i) or (b)(1)(ii) of this section:
 - (i) Perform a liquid-liquid material balance for each month as follows:
 - (A) Measure the mass of each ink, coating, varnish adhesive, primer, solvent and other material used by the affected source during the month.
 - (B) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent and other material used by the affected source during the month using the following procedure in § 63.827 (b)(1):
 - (1) Each owner or operator of a publication rotogravure facility shall determine the organic HAP weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, and other material used in a publication rotogravure affected source

by following one of the procedures in paragraphs (b)(1)(i) through (b)(1)(iii) of this section:

- (i) The owner or operator may test the material in accordance with Method 311 of appendix A of 40 CFR part 63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values cannot be determined using Method 311, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator. The recovery efficiency of the technique must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.
 - (ii) The owner or operator may determine the volatile matter content of the material in accordance with 40 CFR 63.827(c)(1) and use this value for the organic HAP content for all compliance purposes.
 - (iii) The owner or operator may, except as noted in paragraph (b)(1)(iv) of this section, rely on formulation data provided by the manufacturer of the material on a CPDS if
 - (A) The manufacturer has included in the organic HAP content determination all HAP present at a level greater than 0.1 percent in any raw material used, weighted by the mass fraction of each raw material used in the material, and
 - (B) The manufacturer has determined the HAP content of each raw material present in the formulation by Method 311 of appendix A of 40 CFR part 63, or by an alternate method approved by the Administrator, or by reliance on a CPDS from a raw material supplier prepared in accordance with 40 CFR 63.827(b)(1)(iii)(A).
 - (iv) In the event of any inconsistency between the Method 311 of Appendix A of Part 63 test data and formulation data, that is, if the Method 311 test value is higher, the Method 311 test data shall govern, unless after consultation, an owner or operator demonstrates to the satisfaction of the enforcement authority that the formulation data are correct.
- (C) Determine the volatile matter content, including water, of each ink, coating, varnish, adhesive, primer, solvent, and other material used by the affected source during the month following the procedure in 40 CFR 63.827(c)(1).
- (1) Each owner or operator of a publication rotogravure facility shall determine the volatile matter weight-fraction

of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material used using Method 24A of 40 CFR part 60, appendix A.

The Method 24A determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values cannot be determined using Method 24A, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator. The owner or operator may rely on formulation data, subject to the provisions of paragraph (c)(2) of this section.

- (2) Owners or operators may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Appendix A, the applicable test method shall govern, unless after consultation, the owner or operator can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct

- (D) Install, calibrate, maintain and operate, according to the manufacturer's specifications, a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device shall be initially certified by the manufacturer to be accurate to within <plus-minus>2.0 percent.
- (E) Measure the amount of volatile matter recovered for the month.
- (F) Calculate the overall effective organic HAP control efficiency (R_e) for the month using the following equation:

$$R_e = (100) \frac{M_{vu} - M_{hu} + [(M_{vr})(M_{hu})/M_{vu}]}{M_{vu}}$$

Where:

- M_{hu} = the mass of organic HAP used in a month, kg.
 M_{vu} = the mass of volatile matter, including water, used in a month, kg.
 R_e = the overall effective organic HAP control efficiency for publication rotogravure, percent.

For the purposes of this calculation, the mass fraction of organic HAP present in the recovered volatile matter is assumed to be equal to the mass fraction of organic HAP present in the volatile matter used.

- (G) The affected source is in compliance for the month, if R_e is at least 92% of each month.
- (ii) Use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site specific operating parameter to assure capture efficiency as specified in paragraphs (b)(1)(ii)(A) through (b)(1)(ii)(E) of this section:

- (A) Install continuous emission monitors to determine the total organic volatile matter mass flow rate (e.g., by determining the concentration of the vent gas in grams per cubic meter, and the volumetric flow rate in cubic meters per second, such that the total organic volatile matter mass flow rate in grams per second can be calculated and summed) at both the inlet to and the outlet from the control device, such that the percent control efficiency (E) of the control device can be calculated for each month.
- (B) Determine the percent capture efficiency (F) of the capture system according to 40 CFR 63.827(e).
- (C) Calculate the overall effective organic HAP control efficiency (R_e)

$$R_e = (100) \frac{M_{vu} - M_{hu} + [(E/100)(F/100) M_{hu}]}{M_{vu}}$$

Where:

- E = the organic volatile matter control efficiency of the control device, percent
- F = the organic volatile matter capture efficiency of the capture system percent
- M_{hu} = the mass of organic HAP used in a month, kg.
- M_{vu} = the mass of volatile matter, including water, used in a month, kg.
- R_e = the overall effective organic HAP control efficiency for publication rotogravure, percent.

- (D) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameter established in accordance with 40 CFR 63.828(a)(5) whenever a publication rotogravure printing press is operated.
 - (E) The affected source is in compliance with the requirement for the month if R_e is at least 92 percent, and the capture device is operated at an average value greater than, or less than (as appropriate) the operating parameter value established in accordance with 40 CFR 63.828(a)(5) for each three-hour period.
- (iii) An owner or operator using a control device to comply with the requirements of 40 CFR 63.824 is not required to conduct an initial performance test to demonstrate compliance if one or more of the criteria in paragraphs (A) through (C) of this section are met:
- (A) A control device that is in operation prior to May 30, 1996, does not need to be tested if
 - (1) it is equipped with continuous emission monitors for determining inlet and outlet total organic volatile matter concentration, and capture efficiency has been determined in accordance with the requirements of this subpart, such that an overall HAP control efficiency can be calculated, and
 - (2) the continuous emission monitors are used to demonstrate continuous compliance in accordance with 40 CFR 63.828, or
 - (B) the owner or operator has met the requirements of either 40 CFR 63.7(e)(2)(iv) or 40 CFR 63.7(h), or

- (C) the control device is a solvent recovery system and the owner or operator chooses to comply by means of a monthly liquid-liquid material balance.
- (c) An owner or operator complying with 40 CFR 63.824-63.825 through continuous emission monitoring of a control device shall install, calibrate, operate, and maintain continuous emission monitors to measure the total organic volatile matter concentration at both the control device inlet and the outlet.
- (d) Pursuant to the 40 CFR 63.828 (Monitoring Requirements), an owner or operator complying with the requirements of 40 CFR 63.824 through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:
 - (i) Submit to the Administrator with the compliance status report required by 40 CFR 63.9(h) of the General Provisions, a plan that
 - (A) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained,
 - (B) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and
 - (C) Identifies the specific monitoring procedures;
 - (ii) Set the operating parameter value, or range of values, that demonstrate compliance with 40 CFR 63.824, and
 - (iii) Conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require an alternate monitoring scheme.
- (e) Any excursion from the required operating parameters which are monitored in accordance with paragraphs (a)(4) and (a)(5) of this section, unless otherwise excused, shall be considered a violation of the emission standard.
- (f) Pursuant to 40 CFR 63.829 (Recordkeeping Requirements), each owner or operator of an affected source subject to this subpart shall maintain the records specified in paragraphs (b)(1) through (b)(3) of this section on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1):
 - (1) Records specified in 40 CFR 63.10(b)(2) of this part, of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

Each owner or operator of an affected source subject to this subpart shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.824. The records shall be maintained in accordance with the requirements of 40 CFR 63.10(b).

- (g) Pursuant to 40 CFR 63.830 (Reporting requirements), each owner or operator of an affected source subject to 40 CFR 63, Subpart KK shall submit the reports specified in paragraphs (1) through (4) of this section to the Administrator:
 - (1) An initial notification required in 40 CFR 63.9(b).
 - (i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in 40 CFR 63.826(a).

- (2) A Notification of Compliance Status specified in 40 CFR 63.9(h).
- (3) Start-up, shutdown, and malfunction reports specified in 63.10(d)(5), except that the provisions in subpart A pertaining to start-ups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.
 - (i) If actions taken by an owner or operator during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the owner or operator shall state such information in the report. The start-up, shutdown, or malfunction report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that shall be submitted to the Administrator.
 - (ii) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (6) of this section.
- (4) A summary report specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i), the summary report shall include, as applicable:
 - (i) Exceedances of the standards in 40 CFR 63.824.
 - (ii) Exceedances of either of the criteria of 40 CFR 63.820(a)(2).

State Rule Applicability

- (a) 326 IAC 8-5-5 (Miscellaneous Operations: Graphic Arts Operations)
This rule applies to new (after November 1, 1980) publication rotogravure sources, or facilities, located anywhere in the state, with potential emissions of twenty-five (25) per year or more volatile organic compounds.

The proposed two (2) publication rotogravure printing presses WR0493 and WR0494, which emit VOC at levels greater than 250 tons per year, are subject to this rule. Pursuant to 326 IAC 8-5-5(c), no owner or operator of a facility subject to this section and employing solvent containing ink may cause, allow, or permit the operation of the facility unless:

- (1) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water;
- (2) the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material;
- (3) the owner or operator installs and operates:
 - (A) a carbon adsorption system that reduces the volatile organic emissions from the capture system by at least ninety percent (90%) by weight;
 - (B) an incineration system that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water; or
 - (C) an alternative volatile organic compound emission reduction system demonstrated to have at least a ninety percent (90%) reduction efficiency, measured across the control system, and has been approved by the commissioner, or
 - (D) a capture system must be used in conjunction with the emission control systems

specified above. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emissions control system, of:

- (1) seventy-five percent (75%) for publication rotogravure processes.

The source is in compliance with 326 IAC 8-5-5 by using the existing carbon adsorption solvent recovery system, with an overall control efficiency of 95%, which exceeds the required overall control efficiency of 75%.

- (b) 326 IAC 2-4-1.1 (New Sources Toxics Control)
This rule is not applicable to the two (2) presses, because they are subject to the NESHAP, 40 CFR Part 63, Subpart KK. Pursuant to Section 1(b)(2) of this rule, a major source specifically regulated, or exempted from regulation, by a standard issued to Section 112(d), or 112(j) of the Clean Air Act are exempted from 326 IAC 2-4.1-1.

The request to amend Construction Condition No. 4 of the PSD permit 085-4396-0009 by extending the commencement of construction of the two presses to January 27, 2002 is therefore granted based on the above information.

All other conditions of the PSD permit shall remain unchanged and in effect.

Conclusion

The amendment to extend the commencement of construction for the two (2) presses shall be subject to the conditions in this **Amendment 085-12261-00009**.